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98-141

SBC/Ameritech Merger Conditions
2001 Compliance Audit Reports
Report Date August 30, 2002

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SBC/Ameritech Merger Conditions
2001 Compliance Audit Reports
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Transmittal Letter

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FEDERAL COMMUNICATIONS COMMISSION
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September 3, 2002

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.; Room TW-A325
Washington, D.C. 20554

RE: In the Matter of Applications for Consent to the Transfer of Control of Licenses
and Section 214 Authorizations from Ameritech Corporation, Transfer, To SBC
Communications, Inc., Transferee.
(CC Docket No. 98-141)

Dear Ms. Dortch:

Pursuant to Appendix C (Merger Conditions) regarding SBC Communications Inc.'s (SBC) compliance with the conditions set forth in the Federal Communications Commission's (FCC's) Order approving the SBC/Ameritech Merger, SBC submits herein the report of its independent auditor, Ernst & Young LLP, regarding its compliance during the period January 1, 2001 through December 31, 2001.

Once SBC has had an opportunity to thoroughly conduct a review of the report and the auditor's work papers, SBC will be prepared to respond to or otherwise address any issues contained in them.

Sincerely,

Attachments

Cc: Ms. Maureen Del Duca
Mr. Anthony Dale
Mr. Hugh Boyle
Mr. Mark Stephens

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Report of Independent Accountants

To the Management of SBC Communications Inc.

1. We have examined SBC Communications Inc.'s (the "Company" or "SBC") compliance with the Merger Conditions¹ during the year ended December 31, 2001 and management's assertion, included in the accompanying Report of Management on Compliance with the Merger Conditions ("Report of Management"), that SBC complied with the Merger Conditions for the year ended December 31, 2001, except as noted therein. Additionally, as discussed in paragraph six below, we have examined the accuracy and completeness of reported data related to eight service quality measurements calculated under the Business Rules² for the year ended

¹ Merger Conditions are set forth in Appendix C of the Federal Communications Commission's ("FCC's") Order Approving the SBC/Ameritech Merger (*Applications of Ameritech Corp. and SBC Communications Inc. for Consent to Transfer Control of Corporations Holding Commission Licenses and Lines Pursuant to Section 214 and 310(d) of the Communications Act and Parts 5, 22, 24, 25, 63, 90, 95 and 101 of the Commission's Rules*, CC Docket No. 98-141, *Memorandum Opinion and Order*, 14 FCC Rcd 11712 (1999)). Condition 11, "Collocation Compliance," of the Merger Conditions requires the Company to provide collocation consistent with the FCC's Collocation Rules as defined in paragraphs 555-607 in the *Implementation of Local Competition Provisions of the Telecommunications Act of 1996, First Report and Order and Fourth Notice of Proposed Rulemaking*, CC Docket No. 96-98 (FCC 96-325), 11 FCC Rcd 15499 (1996) ("Local Competition Order"), and *Deployment of Wireline Service Offering Advanced Telecommunications Capability*, CC Docket No. 98-147, *First Report and Order* (FCC 99-48), 14 FCC Rcd 4761 (1999), and as modified and expanded by *Deployment of Wireline Service Offering Advanced Telecommunications Capability and Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket Nos. 98-147 and 96-98, *Order on Reconsideration And Second Further Notice Of Proposed Rulemaking In CC Docket No. 98-147 And Fifth Further Notice of Proposed Rulemaking in CC Docket No. 96-98* (FCC 00-297), 15 FCC Rcd 17806 (2000), as modified by the waiver granted to SBC in *Deployment of Wireline Services Offering Advanced Telecommunications Capability*, CC Docket No. 98-147, *Memorandum Opinion and Order* (DA 00-2528), released November 7, 2000 ("Waiver Order"), as modified and expanded by *Deployment of Wireline Order* (FCC 01-204), 16 FCC Rcd 15435 (2001), including collocation rules codified in 47 C.F.R. Sections 51.319 (a)2(iv), 51.321, and 51.323 as modified by the waiver granted to SBC in the Waiver Order. Additionally, "Collocation Compliance" as referred to in this report includes compliance with certain collocation-related requirements applicable only to SBC, which were adopted as conditions to the FCC's order modifying the separate affiliate for advanced services requirements of the Merger Conditions. These collocation-related requirements are discussed in paragraphs 5(a), 5(b)(1), 5(b)(2), 5(c), 5(d), and 6 of Appendix A of the *Ameritech Corp., Transferor, and SBC Communications, Inc., Transferee, For Consent to Transfer Control of Corporations Holding Commission Licenses and Lines Pursuant to Sections 214 and 310(d) of the Communications Act and Parts 5, 22, 24, 25, 63, 90, 95, and 101 of the Commission's Rules*, CC Docket No. 98-141 and ASD File No. 99-49, *Second Memorandum Opinion and Order* (FCC 00-336), rel. September 8, 2000 ("Pronio Order"). This examination did not include procedures necessary to determine compliance with the FCC's pricing rules.

² "Business Rules" refers to the criteria agreed to by the Company and the FCC Staff on August 13, 2001 for reporting additional service quality results. These Business Rules are documented at

To the Management of SBC Communications Inc.

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December 31, 2001 and management's assertion, included in the accompanying Report of Management, that the Company reported accurate and complete data related to the reporting of eight service quality measurements calculated under the Business Rules for the year ended December 31, 2001, except as noted therein. Management is responsible for the Company's compliance with the Merger Conditions and with the reporting of accurate and complete service quality measurements in accordance with the Business Rules. Our responsibility is to express an opinion based on our examination.

2. At the direction of the FCC Staff and the Company, this examination does not address compliance with Condition 1 and the portion of Condition 11 related to compliance with the collocation-related requirements outlined in the Pronto Order, as defined in footnote one of this report ("Pronto Collocation Requirements"). Condition 1 is addressed in a separate agreed-upon procedures engagement report of Ernst & Young LLP. Compliance with the Pronto Collocation Requirements will be the subject of a separate attestation engagement report by Ernst & Young. As required by Condition 26, "Compliance Program," the Company filed an annual compliance report on March 15, 2002, which included information related to Condition 1 and the Pronto Collocation Requirements. The procedures performed for Condition 1, which were agreed to by the FCC and SBC, contained procedures to test the accuracy and completeness of the Company's annual compliance report as it relates to Condition 1. Additionally, we did not perform any procedures regarding the information contained in the annual compliance report for the Pronto Collocation Requirements.
3. Except as discussed in paragraphs two, six, and seven c of this report, our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and, accordingly, included examining, on a test basis, evidence about the Company's compliance with the requirements referenced above and performing such other procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion. Our examination does not provide a legal determination on the Company's compliance with specified requirements.
4. It is the Company's understanding that, under Title 47 Parts 51.321(d) and (e) and 51.323(b) of the Code of Federal Regulations, in instances where the Company denies a collocation request based on the Company's determination that the request was not technically feasible or the equipment was not necessary for the purpose of obtaining interconnection or access to unbundled network elements, the Company is required to

<https://clec.sbc.com/clec/unrestr/custguide/clecarmis.cfm> and replace Sections III.1., III.2., and III.3. of the NARUC White Paper related to the reporting requirements of Condition 24.

To the Management of SBC Communications Inc.

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satisfy its evidentiary obligations to the relevant state commissions concerning the denial only when either the requesting telecommunications carrier disputes the denial before the state commission or the state commission requests support for the denial. Based on this understanding, the Company's policy was not deemed to be in noncompliance with these related rules.

5. Condition 19, "Shared Transport in Ameritech States," requires the Company to offer shared transport in the Ameritech States under terms and conditions, other than rate, structure, and price, similar to those that it offered in Texas as of August 27, 1999. The FCC determined *In the Matter of SBC Communications, Inc. Apparent Liability for Forfeiture*, File No. EB-01-IH-0030 NAL/Acct. No. 200232080004, *Notice of Apparent Liability (NAL)*, that the Company violated Condition 19 by refusing to allow CLECs in the Ameritech States to utilize "shared transport" to provide end-to-end routing of intraLATA toll calls. The Company has disputed this *Notice of Apparent Liability* and asserted that Condition 19 does not require the Company to allow CLECs in the Ameritech States to utilize shared transport to route intraLATA toll calls. Based on the FCC's interpretation of the requirements of Condition 19 as stated in the NAL, the Company did not comply with the requirements of Condition 19. This matter is still pending as of the date of this report.
6. The Merger Conditions require the independent accountant to attest to the accuracy and completeness of the performance data, including restated data, provided to telecommunications carriers and regulators under the Merger Conditions. Based on the FCC Staff's interpretation of the Merger Conditions, the term "performance data" applies to both Condition 7 and Condition 24. However, under the Company's interpretation of the Merger Conditions, the Company does not believe that the scope of the independent accountant's attestation engagement regarding the Company's compliance with the Merger Conditions applies to the accuracy and completeness of service quality data in conjunction with Condition 24, but rather applies only to the accuracy and completeness of performance measurement data provided to telecommunications carriers and regulators in conjunction with Condition 7, "Carrier-to-Carrier Performance Plan." Due to the differing interpretations noted above, the FCC Staff and the Company agreed that Ernst & Young would test and report on the accuracy and completeness of eight service quality measurements as selected by the FCC Staff calculated under the Business Rules for the year ended December 31, 2001. On November 13, 2001, the Company filed revised service quality results with the FCC in accordance with the Business Rules for the months of January through June 2001. The Company informed us that during the discussions of definitions between the Company and the FCC Staff, the Company indicated certain of the service quality measures could not be restated on a retroactive basis in accordance with the Business

To the Management of SBC Communications Inc.

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Rules due to limitations within the existing abilities of the Company's systems to retrieve the data needed to restate certain measures. The service quality measures that the Company informed us could not be restated for the months of January through June 2001 are Installation Line Number 130, "Number of orders pending more than 30 days," for all regions. Accordingly, we are unable to, and do not, express an opinion on the accuracy of Installation Line Number 130, "Number of orders pending more than 30 days," for the period of January 1, 2001 to June 30, 2001. Subsequent to June 2001, the Company began filing service quality results in accordance with the new Business Rules. The FCC Staff selected eight service quality measures as listed below for Ernst & Young to test and report on the accuracy and completeness for the year ended December 31, 2001.

Installation Measures

1. Line Number 110 – Number of orders completed within five working days
2. Line Number 125 – Percentage orders completed by due date
3. Line Number 130 – Number of orders pending more than 30 days

Repair – Basic Service

1. Line Number 300 – Number of closed trouble reports
2. Line Number 301 – Number of repeat trouble reports
3. Line Number 320 – Number of repair commitments met
4. Line Number 345 – Percent service restored within 24 hours

Answer Time Performance

1. Line Number 550 – Average live attendant answer time (seconds)

Our examination disclosed that certain of the eight service quality measures described above contained errors as described in Attachment B to this report.

7. Our examination disclosed the following material noncompliance with the Merger Conditions applicable to the Company during the year:
 - a. Condition 3, "Advanced Services Operations Support Systems," and Condition 15, "Carrier-to-Carrier Promotions: Resale Discount," require the Company to provide discounts to Competitive Local Exchange Carriers ("CLECs") for orders of certain products, including but not limited to unbundled loops for advanced services and unbundled network element facilities used to provide residential telephone services to end-user customers, and residential resale discounts. The Company was required to apply these discounts within 60 days of the initial billing for the service through credits, true-ups, or other billing mechanisms.

To the Management of SBC Communications Inc.

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However, during the period from January 1, 2001 through October 22, 2001³ for Condition 3, and during the year ended December 31, 2001 for Condition 15, certain discounts were not provided within 60 days of the initial billing for the service as required by the Merger Conditions or were not provided.

- i. Condition 3 Advanced Services Discount: 1) In the Ameritech States⁴, discounts were not provided on certain eligible CLEC orders for certain loops within 60 days of the initial billing for the service due to an error in updating billing tables; 2) at Southwestern Bell Telephone, L.P. ("SWBT"), discounts were not provided on all eligible recurring and nonrecurring charges for stand-alone Asymmetric Digital Subscriber Line ("ADSL") loops within 60 days of initial billing for the service due to an error in the application of one Universal Service Order Code ("USOC"); 3) at The Southern New England Telephone Company ("SNET"), discounts were not provided within 60 days of initial billing for the service on all eligible recurring and nonrecurring charges during the period January through April 2001 due to an error in the update of a rate table; and 4) at SWBT, Pacific Bell, and Nevada Bell, no discounts were provided on eligible CLEC orders for Integrated Services Digital Network Digital Subscriber Line ("IDSL") services within 60 days of the initial billing for the service.
- ii. Condition 15 Resale Discount: 1) In the Ameritech States, certain eligible CLECs did not receive discounts within 60 days of the initial billing for the service as required by the Merger Conditions for usage-based services on final bills, and for resold services where the CLEC's end-user customer moved to another location ("T Orders"); 2) at SWBT, the promotional discount on final bill adjustments for usage-based services was not provided within 60 days of initial billing for the service during the year; and 3) at Pacific Bell and Nevada Bell,

³ On October 23, 2001, the Company filed notice with the FCC regarding its satisfaction on October 22, 2001 of certain Condition 3 requirements related to the development and deployment of enhancements to existing interfaces for pre-ordering and ordering xDSL and other advanced services components applicable to all states except Connecticut. In accordance with Paragraph 18 of the Merger Conditions, the Company was no longer required to provide the Condition 3 Advanced Services Discount after this date except in Connecticut.

⁴ "Ameritech States" refers to Illinois Bell Telephone Company; Indiana Bell Telephone Company, Incorporated; Michigan Bell Telephone Company; The Ohio Bell Telephone Company; and Wisconsin Bell, Inc. collectively.

To the Management of SBC Communications Inc.

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discounts were not provided within 60 days of initial billing for the service for local usage-based services during the year.

- b. Condition 5, "Loop Conditioning Charges and Cost Studies," requires the Company to not charge for loop conditioning on loops less than 12,000 feet and requires the Company to obtain a requesting CLEC's authorization to perform conditioning, including agreement on cost, before proceeding on any conditioning. Due to a system error at SWBT, CLEC orders submitted with a specific combination of ordering codes were inadvertently billed for loop conditioning for loops less than 12,000 feet and for loop conditioning without prior authorization from the requesting CLEC in the months of January and February 2001.
- c. Condition 7, "Carrier-to-Carrier Performance Plan," requires the Company to report, on a monthly basis, operational performance in 20 measurement categories specified in the Merger Conditions. Certain of these measurements contained errors as described in Attachment A to this report. Additionally, Condition 7 requires the Company to make voluntary payments to the U.S. Treasury based on the results of the 20 measurements reported. We have tested the accuracy of the calculation of voluntary payments calculated prior to the impact of the errors described in Attachment A to determine whether the required payment to the U.S. Treasury was remitted noting no exceptions. However, the Company has not determined the impact, if any, of the errors described in Attachment A to this report on the voluntary payments paid to the U.S. Treasury. Accordingly, we were unable to, and do not, express an opinion on the accuracy of the Company's compliance with the requirement to accurately calculate and remit voluntary payments.
- d. Condition 11, "Collocation Compliance," requires the Company to provide collocation consistent with the FCC's Collocation Rules. The following was noted:
 - i. Title 47 Part 51.321(h) requires the Company to maintain a publicly available document, posted for viewing on the incumbent local exchange carrier's publicly available Internet site, indicating all premises that are full, and to update such a document within ten days of the date at which a premise runs out of physical collocation space. We noted instances where the Company did not post updates to the Internet site within the required ten-day period. We also noted instances in which the Company did not remove premises from the

To the Management of SBC Communications Inc.

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Internet site within 10 days after physical collocation space became available.

- ii. The Waiver Order, as defined in footnote one of this report, requires the Company to notify a requesting carrier whether its physical collocation request can be accommodated within eight business days (roughly, 11 calendar days) of the Company's receipt of a physical collocation application, except to the extent a state has set its own intervals. We noted instances in which the Company did not provide notification to the carrier of whether its physical collocation request could be accommodated within the appropriate timeline.
 - iii. We noted instances where the Company over- or underbilled collocation charges to nonaffiliated telecommunications carriers for both recurring and nonrecurring charges. We also noted instances where the Company did not bill an affiliate and also did not bill certain nonaffiliated telecommunications carriers timely for recurring and nonrecurring collocation charges.
 - iv. Title 47 Part 51.321(f) requires the Company to submit to the state commission detailed floor plans or diagrams of any premises where the Company claims that physical collocation is not practical because of space limitations. We noted instances in which floor plans or diagrams were not submitted to the state commissions.
- e. Condition 26, "Internal Compliance Program," requires the Company to file, for public record, an annual compliance report detailing the Company's compliance with the Merger Conditions. The Company filed its annual compliance report covering the year ended December 31, 2001 on March 15, 2002 as required. The filed annual compliance report did not note the material noncompliance related to Condition 3, "Advanced Services OSS," as discussed in paragraph 7a(i) as it relates to SWBT, material noncompliance as it related to Condition 5, "Loop Conditioning Charges and Cost Studies," as discussed in paragraph 7b, Condition 11, "Collocation Compliance," as discussed in paragraph 7d(iv) as it relates to submission to the state commission of detailed floor plans or diagrams of any premises where the Company claims that physical collocation is not practical because of space limitations, and Condition 11 as discussed in paragraph 7d(iii) as it relates to not billing nonaffiliated telecommunications carriers timely.

To the Management of SBC Communications Inc.

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8. Our examination also disclosed various formal complaints⁵ filed with the FCC or a state regulatory commission that were unresolved as of the date of this report. Those unresolved formal complaints that allege noncompliance with the Merger Conditions during the year ended December 31, 2001 are included in Attachment C to this report except formal complaints that allege noncompliance related to a Merger Condition that has already been reported herein. The Company disputes all of the formal complaints disclosed in Attachment C and contends that it has complied with the Merger Conditions in all instances.
9. In our opinion, limited as to Conditions 1, 7, and certain aspects of Conditions 11 and 26 as discussed in paragraphs two and seven c of this report, and considering the Company's interpretations of the Merger Conditions described in paragraph four, and the interpretations of matters discussed in paragraph eight, except for the material noncompliance described in paragraph seven above, and except for the statements and legal interpretations set forth by the FCC as discussed in paragraph five, the Company complied, in all material respects, with the Merger Conditions for the year ended December 31, 2001, including the filing of an accurate annual compliance report, the Company providing the FCC with timely and accurate notice pursuant to specific notification requirements, and the Company providing telecommunications carriers and regulators with accurate and complete performance data. Additionally, pertaining to Condition 24, limited as discussed in paragraph six of this report and with the exception of the material noncompliance described in Attachment B, the Company filed accurate and complete data for the eight service quality measurements discussed in paragraph six above, in all material respects, in accordance with the Business Rules for the year ended December 31, 2001.

⁵ The listing of formal complaints was compiled from the Company's internal records and supported through confirmation with FCC staff and state commissions through August 1, 2002. We are not aware of any other formal complaints filed after August 1, 2002 through the date of this report.

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10. This report is intended solely for the information and use of the Company and the FCC and is not intended to be and should not be used by anyone other than these specified parties. However, this report is a matter of public record and its distribution is not limited.

Ernst & Young LLP

August 30, 2002

**EY Atch. A - Performance
Measurements**

Report of Independent Accountants

Attachment A

Below is a listing of errors noted, by Performance Measurement ("PM") and by region, for Southwestern Bell Telephone, L.P. ("SWBT"), the Ameritech States ("AIT"), Pacific Bell ("PB"), Nevada Bell ("NB"), and The Southern New England Telephone Company ("SNET"). For reporting purposes, PB and NB have been reported together and all exceptions reported relate to both PB and NB unless otherwise noted.

PMs 1 & 1.1

SWBT

1. **Partially Restated** – As a result of programming and data entry errors related to multiple business rule conversions at the state and FCC level, results for certain levels of disaggregation or z-scores for PMs 1 and 6c for January through July 2001 contained bad data and were restated for Missouri and Arkansas in September and October 2001. Kansas and Oklahoma results for January and February 2001 were not restated.
2. **Not Restated** – During 2001, manual entry of timestamps resulted in errors that improperly calculated time intervals.
3. **Restated** – May 2001 data for PMs 1 and 1.1 was restated in July 2001 to correct erroneous data.

PB/NB

1. **Restated** – For PB only, January 2001 data was restated in March 2001 to include data related to two CLECs' Unbundled Network Element Platform ("UNE-P") orders that were excluded in error.
2. **Restated** – For NB only, January through April 2001 results were restated in October 2001 for certain levels of disaggregation as service orders entered into an ordering system identified all orders, including Nevada orders, as California orders. As a result, PMs 1 and 4d results for certain disaggregation levels for NB were initially reported in error. The volume of transactions related to these errors was not deemed to materially misstate PB results for these measures.
3. **Restated** – For PB only, February 2001 results were restated in April 2001 for the Electronically Received/Manually Handled UNE Dedicated Transport data element to more accurately reflect data entered through the EXACT interface.
4. **Restated** – August 2001 results were restated in October 2001 to move Enhanced Extended Loop ("EEL") transactions from a Project category to normal reporting for UNE Loops in the Electronic/Electronic, Electronic/Manual, and Manual/Manual disaggregations.
5. **Restated** – For NB only, May 2001 results for one submeasurement (Projects) were restated in July 2001 to add one firm order confirmation for manually faxed projects for one CLEC and to express the result as a percentage of completed projects within 72 hours as required by the business rules.

6. **Late Implementation** – For NB only, June and July 2001 results were restated in October 2001 to change Simple Local Number Portability (“LNP”) and Complex LNP disaggregations into a combined Standalone LNP data element.
7. **Restated** – For PB only, November 2001 data was restated in January 2002 for resale residential Plain Old Telephone Service (“POTS”) and Centrex submeasurements to properly reflect certain exclusions that were omitted due to a manual error.
8. **Restated** – December 2001 results were restated in May 2002 to correct the interval for some service requests and to add service requests presented through certain OSS.

AIT

1. **Restated** – April 2001 results for the LNP datapoint were restated in July 2001 to properly combine two separate levels of disaggregation into one as required by the business rules.
2. **Restated** – February 2001 PM results were restated in November 2001 for several levels of disaggregation related to PM 1.1 (DSL measures) to further delineate xDSL into broadband versus non-broadband disaggregations as required by the business rules.
3. **Restated** – February through October 2001 results were restated in March 2002 to correct a variety of data issues.
4. **Restated** – In March and April 2002, the Company reported April through December 2001 affiliate results for certain levels of disaggregation for PMs 1.1, 2, 8, 12b, 12c, 13b, and 17. These results were not originally reported because there was no corresponding CLEC activity reported.
5. **Not Restated** – During 2001, the Company did not have the ability to track project due dates, and therefore orders submitted as a project were not included in the results.
6. **Restated** – For PMs 1, 4c, 6c, and 8, July through September 2001 results (depending upon region) were restated in November 2001 to reflect Local Service Center process changes which improved the Company’s ability to track orders with unsolicited firm order confirmations.

SNET

1. **Not Restated** – Entry of response times related to facsimile orders manually entered into the reporting system did not include all relevant data which resulted in improperly calculated time intervals. Not all information was available to restate the submeasures related to manually input fax times.
2. **Restated** – June through October 2001 data was restated in January 2002 to correct a program coding error that incorrectly excluded “projects” (i.e., firm order confirmations associated with “projects”) from reported results for manually submitted firm order confirmations.
3. **Not Restated** – June and July 2001 LNP orders from one OSS system were not appropriately identified resulting in the misstatement of four submeasures. Not all information was available to restate.
4. **Not Restated** – The line count criteria utilized by SNET to determine the levels of disaggregation for certain order types are not consistent with the business rules (i.e., SNET utilized a line count of 1-4 as opposed to 1-49 as stated in the business rules). This impacted PMs 1, 1.1, and 16.

5. **Restated** – June 2001 z-score results were restated in August 2001 for two submeasurements.

PM 2

SWBT

1. **Restated** – Z-scores for January through March 2001 were restated in May 2001 since the value was not carried to the FCC reports from the source reports which are used to calculate the measure.

PB/NB

1. **Late Posting** – For PB only, April 2001 results were not reported until June 2001 to report Verigate and Datagate data elements due to the fact of a review of the data prior to posting identified issues that were not able to be corrected in time for posting with April data.
2. **Late Posting** – January 2001 data was not reported until March 2001 for the Verigate data elements due to concern over transaction volumes detected in a review prior to posting. Original volumes were determined to be correct and were posted in March 2001.
3. **Restated** – March 2001 results were restated in May 2001 in order to add Verigate transactions that were omitted in error as a result of investigation over possible duplicate carrier numbers.
4. **Restated** – For PB only, April 2001 results were restated in October 2001 in order to remove data for a wireless company that was improperly included in the aggregate CLEC results.
5. **Late Implementation** – For NB ILEC only, May 2001 results were not posted until July 2001 to properly report certain submeasurements as parity versus benchmark measurements associated with the adoption of a new version of the business rules.
6. **Not Restated** – Prior to January 2002, PB and NB were unable to differentiate certain pre-order transactions by state. This situation only impacted affiliate results, as CLECs did not initiate pre-order transactions during 2001 through the interfaces in question in Nevada.
7. **Late Posting** – For NB only, June and July 2001 z-scores were not reported for two submeasures until September 2001.
8. **Restated** – For NB only, June 2001 through November 2001 was restated in February 2002 to populate analog data for the Mechanized Loop Qualification, Actual, EDI/CORBA data element.
9. **Not Restated** – For NB only, data was not reported for October through December 2001 in NB since the only CLEC making requests was improperly excluded from reported results.
10. **Restated** – For NB only, June through November 2001 results were restated in February 2002 for nine wholesale data elements due to an error in translating the state results to the FCC results.

AIT

1. **Not Restated** – During 2001, a front-end ordering system was not capable of capturing data at a state level, and as such the Company reported these transactions at a regional level.

2. **Restated** – June through December 2001 results were restated in May 2002 for the customer service record level of disaggregation for one system in order to include records that are greater than 13 kilofeet in the result.
3. **Restated** – June through December 2001 results were restated in June 2002 to include data from one interface omitted in error.
4. This PM was also impacted by AIT PM 1-4 above.

SNET

1. **Restated** – January 2001 results for two submeasurements were restated in March 2001 due to the improper inclusion of detailed customer service record queries.
2. **Restated** – In January and March 2001, data from an OSS source system and in December 2001 data from another OSS source system was not passed to the PM reporting system for three isolated days resulting in the omission of the data from the results. Results were restated in December 2001 and February 2002.

PM 3

SWBT

1. **Restated** – January 2001 results were restated in March 2001 due to data error.
2. **Restated** – June 2001 results were restated in August 2001 as a result of programming issues associated with CLEC to CLEC migrations. The impact of this restatement was primarily confined to one CLEC.
3. **Restated** – August 2001 ILEC results were restated in October 2001 due to an incorrect file used to calculate the results.

PB/NB

1. **Late Posting** – March 2001 results were not posted until May 2001 as a result of programming issues associated with CLEC to CLEC migrations.

AIT

1. **Restated** – May 2001 data was restated in July 2001 because LNP with Loops, which were not designed to flow through, had been incorrectly included in the results.
2. **Restated** – January 2001 results for one datapoint (UNE loops) were restated in March 2001 to remove reject orders from the measure as required by the business rules.
3. **Restated** – March 2001 data was restated in May 2001 to correct one datapoint related to the UNE-P level of disaggregation.
4. **Partially Restated** – Results for August through December 2001 were restated in August 2002 to include flow through eligible resale projects and other data elements that should be included. January through July 2001 results were not restated, although they were affected.
5. **Restated** – April 2001 data was restated in July 2001 due to a data error that misstated results for three submeasures.

SNET

1. **Not Restated** – January 2001 results for two datapoints were misstated due to a programming error that incorrectly included orders that were not flow through eligible.

PM 4a

SWBT

1. **Restated** – Due to improper source data, January 2001 results for two UNE Combo submeasures of PMs 4a and 6b were restated in March 2001.
2. **Partially Restated** – January through June 2001 data was restated for PMs 4a and 7a for Missouri and Arkansas in October 2001 to reflect certain program code changes. Kansas and Oklahoma results were not restated.

PB/NB

1. **Not Restated** – January and February 2001 data for PMs 4a and 5a, January through March 2001 data for PM 4d, and January 2001 data for PM 6a, was improperly including certain interexchange carrier transactions. The correction was implemented on a prospective basis because of problems inherent in rerunning historical data.

AIT

1. **Restated** – March 2001 results were restated for PMs 4a, 4b, and 4c in May 2001 to appropriately capture orders cancelled after a Company caused missed due date.
2. **Partially Restated** – April, May, June, July, August, and September 2001 results for PMs 4a, 4b, 4c, 5a, 5b, 5c, 6a, 6b, 6c, 7a, 7b, 7c, and 8 were restated in November 2001 due to processing delays that resulted in data being posted to the results of the wrong month.
3. **Restated** – April, May, June, and October 2001 results for PMs 4a, 4b, 4c, 5a, 5b, 5c, 6a, 6b, 6c, 7a, 7b, and 7c were restated in November 2001, March 2002, or May 2002 to correct for a data processing error (truncation of files) that affected POTS installation results.
4. **Not Restated** – December 2001 results for PMs 4a, 4b, 5a, 5b, 6a, 6b, 7b, 11a, 11c, 12a, 12c, 13a, and 13c were misstated due to certain UNE-P transactions being classified as retail transactions.
5. **Partially Restated** – For PMs 4a, 4b, 4c, 6a, 6b, 6c, 7a, 7b, 7c, and 8 April 2001 results were restated in August 2002 to address an issue that incorrectly identified orders as duplicates. This also affected January, February, March, May, June, July, and August 2001 results, which have not been restated.
6. **Not Restated** – For PMs 4a, 4b, 5a, 5b, 6a, 6b, 7a, and 7b July through September 2001 results, UNE-P business transactions were not sent to the reporting system.

SNET

1. **Restated** – January through April 2001 results for PMs 4a, 5a, 6a, and 7a were restated in June 2001 to reflect a process improvement which better matches posted orders with completed service orders.

PM 4b

AIT

1. **Restated** – March through September 2001 results for PMs 4b, 4c, 5b, 5c, 6b, 7b, and 7c were restated in February 2002 to exclude certain integrated services digital network – primary rate interface (“ISDN – PRI”) circuits, which were being double counted.
2. **Restated** – October 2001 results for PMs 4b, 5b, 6b, 7b, 11b, 12b, and 13b were restated in March 2002, as original reports did not include transactions for UNE Loop and UNE Port ISDN-PRI products.
3. **Restated** – August through September 2001 results for PMs 4b, 4c, 5b, 5c, 6b, 6c, 7b, 7c, 11b, 11c, 12b, 12c, 13b, and 13c were restated in February 2002 to include results for two new service centers for installation and trouble reporting that did not get included in results.
4. **Not Restated** – For PMs 4b, 6b, 6c.1, 7b, 10a, 11b, 12b, and 13b 2001 results, the reported results for voice grade private line (“VGPL”) orders counted all circuits that ride a T1 instead of counting just the T1 pipe.
5. **Not Restated** – PMs 4b, 4c, 5b, 5c, 6b, 6c, 7b, 7c, 8, 10b, 11b, 11c, 12b, 12c, 13b, and 13c results did not identify and report transactions related to certain products.
6. This PM was also impacted by AIT PMs 4a-1, 4a-2, 4a-3, 4a-4, 4a-5, and 4a-6 above.

PM 4c

PB/NB

1. **Restated** – For NB only, August 2001 results were restated in November 2001 for PMs 4c and 6c to add transactions for one CLEC for the EEL DS1 data element that was improperly excluded due to a manual error.

AIT

1. **Restated** – March and April 2001 data was restated in June 2001 as a result of the DSL Line Sharing disaggregation being omitted due to a missing tracking number.
2. **Restated** – July through October 2001 results were restated in December 2001 for PMs 4c, 5c, and 7c to report the retail equivalent results for 8db loops at the individual item level rather than the order level. This change was made to be consistent with wholesale results, which were reported at the individual item level. Although the business rules state to report both wholesale and retail results at the order level, AIT is reporting on the item level since this is the only information available for wholesale.
3. **Not Restated** – March through May 2001 results for the UNE – 8.0 db datapoints for PMs 4c and 7c were improperly reported under the 1.7 business rules instead of 1.6, which caused a variation in the levels of disaggregation to identify orders with and without fieldwork.
4. **Restated** – June through August 2001 data was restated in October 2001 due to an enhancement to indicate when a due date change was for a customer reason.
5. **Restated** – January through December 2001 retail results were restated in April 2002 for PMs 4c, 5c, 7c, 8, 11b, 11c, 12b, 12c, 13b, and 13c for a small number of submeasurements.

6. **Restated** – December 2001 results were restated in April and July 2002 for PMs 4c, 5c, 6c, 7c, 8, and 11c to capture changes to service order number sequences associated with Broadband Line Share orders.
7. **Not Restated** – For PMs 4c, 5c, 6c, 6c.1, 7c, 10b, 11c, 12c, and 13c, November and December 2001 results for certain DSL transactions were improperly classified as 8db loop transactions.
8. **Not Restated** – For PMs 4c, 5c, 6c, 7c, 8, 10b, 11c, 12c, and 13c, results for 2001 did not properly classify certain transactions as DSL orders.
9. **Late Posting** – March and April 2001 were posted late due to a dropped tracking number that caused the results for one submeasure not to be reported.
10. **Restated** – January through March 2001 data was restated in May 2001 to remove regional affiliate results which had been substituted for the parity comparison in those months and states where there was no affiliate activity.
11. This PM was also impacted by AIT PMs 1-6, 4a-1, 4a-2, 4a-3, 4a-5, 4b-1, 4b-3, and 4b-5 above.

SNET

1. **Restated** – January through November 2001 results for two data points incorrectly excluded 8db loops from both the numerator and the denominator. Results were restated in February 2002. This also impacted PMs 6c and 7c.
2. **Restated** – The February 2001 results for one data point were restated in February 2002 to correct a data transfer error. The process has now been mechanized.
3. **Restated** – September through November 2001 results for PMs 4c, 5c, 6c, 7c, and 8 were restated in January 2002 to include additional UNE DSL Loop line sharing service orders. These orders were not included in previously stated results due to a program coding error.

PM 4d

PB/NB

1. **Restated** – For PB only, February 2001 results were restated in April 2001 to correct an underreporting of completions associated with a recently implemented system.
2. **Restated** – For PB only, June 2001 results were restated in September 2001 in order to correct one submeasure for three orders that were intended to be excluded from the measurement but were not due to a manual error.
3. **Restated** – For NB only, May 2001 was restated in July 2001 to report the number of completions within the benchmark interval rather than the average time for a completion notice for some of the data elements as a result of the implementation of new business rules.
4. **Restated** – For NB only, January through March 2001 results were restated in October 2001 for the LEX/EDI/CLEO data elements due to programming logic corrections.
5. This PM was also impacted by PB/NB PMs 1-2 and 4a-1 above.

AIT

1. **Restated** – March through May 2001 data was restated in July 2001 to include UNE Combo orders in the results and exclude test transactions included in error.
2. **Not Restated** – Results for 2001 did not include LNP transactions.
3. **Not Restated** – January and February 2001 results did not include UNE-P transactions.

PM 5a

SWBT

1. **Partially Restated** – For the period January through July 2001, due to sequencing problems with the Loop Maintenance Operations System ("LMOS"), certain CLEC trouble reports were improperly reported as retail trouble reports impacting the accuracy of PMs 5a, 10a, 11a, 12a, and 13a. Also, LMOS UNE-P trouble tickets that were unclassified were defaulted to "residential" class of service without knowledge of the correct class of service. June and July 2001 results were restated in August and September 2001 to reflect corrections made to the LMOS database. Prior months were not restated.

PB/NB

1. **Restated** – For PB only, February 2001 results for PMs 5a, 5b and 5c were restated in April 2001 for UNE Loops and Retail Business and Residence POTS resulting in a small improvement in results for those data elements. The adjustment was necessary because of a manual error during the process of filtering data.
2. **Restated** – For NB only, June and July 2001 results were restated in November 2001 for PMs 5a and 5c in order to exclude some orders and reclassify others that were previously reported inappropriately due to incorrect programming logic associated with the adoption of new business rules.
3. **Not Restated** – For 2001, PMs 5a and 5c should have been reported by regional level instead of state, and PM 8 should have been reported by state level instead of regional.
4. This PM was also impacted by PB/NB PM 4a-1 above.

AIT

1. **Restated** – June 2001 results for Illinois were restated in November 2001 for PMs 5a and 5c since the file used to calculate the measures did not contain complete data.
2. This PM was also impacted by AIT PMs 4a-2, 4a-3, 4a-4, and 4a-6 above.

SNET

1. This PM was impacted by SNET PM 4a-1 above.

PM 5b

PB/NB

1. **Late Posting** – June and July 2001 results for two submeasurements were not filed until September 2001.
2. This PM was also impacted by PB/NB PMs 5a-1 and 5a-3 above.

AIT

1. **Restated** – September 2001 results for PMs 5b and 5c were restated in November 2001 to incorporate changes in the numerator selection criteria so that actual trouble reports are used and so that provisioning trouble reports (“PTRs”) are identified.
2. **Restated** – January through April 2001 ILEC results for one submeasure (Resold Specials ISDN) were accidentally dropped in August 2001.
3. This PM was also impacted by AIT PMs 4a-2, 4a-3, 4a-4, 4b-1, 4b-2, 4b-3, 4b-5, and 4a-6 above.

PM 5c

SWBT

1. **Not Restated** – SWBT does not take allowed exclusions related to DSL loops greater than 12 thousand feet and when acceptance testing is available but not selected by the customer due to system limitations. This situation impacts PMs 5c, 11c, 12c, and 13c.
2. **Partially Restated** – January and February 2001 Missouri z-scores for 8db loops were restated in April 2001 to correct a data error. Kansas results were impacted but not restated.
3. **Late Posting** – February through July 2001 results for affiliate data were restated on September 2001.

PB/NB

1. **Restated** – For PB only, April 2001 results were restated in June 2001 in order to report UNE Loop trouble tickets in the proper geographic area.
2. **Restated** – For PB only, April and May 2001 results were restated in September 2001 for PMs 5c, 10b, 11c, 12c and 13c in order to include additional trouble tickets for UNE-P service that were previously not reported.
3. This PM was also impacted by PB/NB PMs 5a-1, 5a-2, and 5a-3 above.

AIT

1. **Restated** – April through August 2001 results were restated in October 2001 to include POTS-ISDN records in the retail result.
2. **Restated** – April 2001 results were restated in July 2001 because the retail equivalent did not get reported.
3. **Not Restated** – AIT does not take allowed exclusions related to DSL loops greater than 12 thousand feet and when acceptance testing is available but not selected by the customer due to system limitations. This situation impacts PMs 5c, 11c, 12c, and 13c.
4. **Restated** – For PMs 5c, 6b, 6c, 8, and 9, March, April, or May 2001 (depending upon measure) results were restated in June or July 2001 to adjust PMs for the appropriate treatment of holidays.

5. This PM was also impacted by AIT PMs 4a-2, 4a-3, 4b-1, 4b-3, 4b-5, 4c-2, 4c-5, 4c-6, 4c-7, 4c-8, 5a-1, and 5b-1 above.

SNET

1. **Not Restated** – SNET does not take allowed exclusions related to DSL loops greater than 12 thousand feet and when acceptance testing is available but not selected by the customer due to system limitations. This situation impacts PMs 5c, 11c, 12c, and 13c.
2. **Restated** – June through September 2001 results were restated in May 2002 to correct the parity comparison for 8db UNE loops from retail residence and business fieldwork to retail business fieldwork and no fieldwork.
3. This PM was also impacted by SNET PM 4c-3.

PM 6a

SWBT

1. **Restated** – A restatement was made in July 2001 to correct the “no fieldwork” disaggregations for May 2001 data.
2. **Restated** – June 2001 data for Missouri was restated in November 2001 to remove SWBT retail orders incorrectly assigned to one CLEC.

PB/NB

1. This PM was impacted by PB/NB PM 4a-1 above.

AIT

1. **Restated** – January through April 2001 results were restated in either May, June, or July 2001 to correct programming logic that did not properly exclude wholesale residential and business no fieldwork orders with due dates beyond the next business day.
2. **Restated** – December 2001 results for PMs 6a, 6b, 6c, and 8 were restated in January 2002 because data processing problems were encountered while upgrading the application that publishes the performance reports. Zeros were reported when data actually existed.
3. This PM was also impacted by AIT PMs 4a-2, 4a-3, 4a-4, 4a-5, 4a-6 above.

SNET

1. **Restated** – January through February 2001 results were restated in April 2001 for two submeasures to properly exclude orders with requested due dates greater than one business day. These same results, as well as results from March and April 2001, were restated in June 2001 to properly count all orders with Company offered due dates.
2. **Restated** – January 2001 results for two datapoints were restated in June 2002 to include additional orders that were originally omitted from the results.
3. This PM was also impacted by SNET PM 4a-1 above.

PM 6b

SWBT

1. **Restated** – January 2001 results were restated in March 2001 to correct a data error.
2. This PM was also impacted by SWBT PM 4a-1 above.

AIT

1. **Restated** – July 2001 results were restated in November 2001 to properly report wholesale ISDN-PRI transactions.
2. This PM was also impacted by AIT PMs 4a-2, 4a-3, 4a-4, 4a-5, 4a-6, 4b-1, 4b-2, 4b-3, 4b-4, 4b-5, 5c-4, and 6a-2 above.

SNET

1. **Not Restated** – April and May 2001 results were incorrect due to the Company not taking an allowable exclusion for customer-caused misses.

PM 6c & 6c.1

SWBT

1. **Restated** – January through April 2001 data was restated in September 2001 for one submeasure (Dark Fiber) to include additional orders.
2. This PM was also impacted by SWBT PM 1-1 above.

PB/NB

1. This PM was impacted by PB/NB PM 4c-1 above.

AIT

1. **Late Posting** – June, July, and August 2001 results were posted in October 2001 to implement version 1.7 of the business rules.
2. **Restated** – July 2001 results were restated in October 2001 for PMs 6c and 8 to properly identify conditioning for DSL loops without line sharing. PM 6c (v1.7) was also restated during this period to include the disaggregation for DSL – Line Share.
3. **Restated** – January through March 2001 results were restated in February 2002 and April and May 2001 results were restated in July 2001 to measure quantities at an “order level circuit count” instead of “item count.”
4. **Restated** – April 2001 results were restated in July 2001 for PMs 6c and 8 to correct the measured due date on orders where the due date preceded the order receipt date.
5. **Not Restated** – PM 6c and 8 results for October through December 2001 did not correctly identify conditioned and non-conditioned DSL orders.
6. This PM was also impacted by AIT PMs 1-6, 4a-2, 4a-3, 4a-5, 4b-3, 4b-4, 4b-5, 4c-6, 4c-7, 4c-8, 5c-4, and 6a-2 above.

SNET

1. **Restated** – January through April 2001 data was restated in June 2001 to include an exception stated in the business rules (customer requested due dates greater than x business days).
2. This PM was also impacted by SNET PMs 4c-1 and 4c-3 above.

PM 7a

SWBT

1. This PM was impacted by SWBT PM 4a-2 above.

AIT

1. This PM was impacted by AIT PMs 4a-2, 4a-3, 4a-5, 4a-6 above.

SNET

1. This PM was impacted by SNET PM 4a-1 above.

PB/NB

1. **Restated** – For NB only, May 2001 results were restated in July 2001 for PMs 7a and 7c in order to correct results due to a programming issue.

PM 7b

SWBT

1. **Not Restated** – For January through June 2001, certain-on time completions were counted as missed completions due to an error in the Company's processes.

AIT

1. This PM was impacted by AIT PMs 4a-2, 4a-3, 4a-4, 4a-5, 4a-6, 4b-1, 4b-2, 4b-3, 4b-4, and 4b-5 above.

PM 7c

SWBT

1. **Restated** – February 2001 results were restated in April 2001 due to a formatting issue associated with converting the state measures to the FCC format.

PB/NB

1. This PM was impacted by PB/NB PM 7a-1 above.

AIT

1. **Partially Restated** – January through April 2001 retail results were restated in July 2001 and April, May, October, and November 2001 results were restated in May 2002 to include misses due to facility reasons. July through September 2001 results have not been restated.
2. This PM was also impacted by AIT PMs 4a-2, 4a-3, 4a-5, 4b-1, 4b-3, 4b-5, 4c-2, 4c-3, 4c-5, 4c-6, 4c-7, and 4c-8 above.

SNET

1. **Restated** – April 2001 data was restated in June 2001 to reflect service order level data for 8db loops versus circuit level data.
2. This PM was also impacted by SNET PMs 4c-1 and 4c-3 above.

PM 8

SWBT

1. **Not Restated** – January 2001 data was restated in March 2001 to correct a formatting error, which resulted in a submeasure not being reported (no line sharing) and the data for that submeasure being combined into another submeasure (DSL, no conditioning, line sharing).

PB/NB

1. This PM was impacted by PB/NB PM 5a-3 above.

AIT

1. **Restated** – January through June 2001 results were restated in September 2001 and July 2001 results were restated in October 2001 to reflect the proper classification of conditioning for the DSL without line sharing submeasurement.
2. **Restated** – October through December 2001 results were restated in March 2002 to account for discrepancies regarding the way facility modifications are counted for no line share conditioned/non-conditioned loops.
3. **Not Restated** – During 2001, the Company did not have a way to track expedited orders and therefore did not exclude expedited orders from the results as stated in the business rules.
4. **Not Restated** – Results for 2001 did not exclude orders with CLEC requested due dates greater than the offered interval.
5. This PM was also impacted by AIT PMs 1-4, 1-6, 4a-2, 4a-5, 4b-5, 4c-5, 4c-6, 4c-8, 5c-4, 6a-2, 6c-2, 6c-4, and 6c-5 above.

SNET

1. **Not Restated** – For January through March 2001, an exclusion related to “customer requested due dates beyond the offered interval” was not taken. Results were not restated.
2. This PM was also impacted by SNET PM 4c-3 above.

PM 9

PB/NB

1. **Restated** – January through April 2001 data was restated in August 2001 to correctly identify the start time as the time a request for loop qualification was received versus the time the request was entered to the system.
2. **Restated** – January through September 2001 results were restated in October and November 2001 to combine two levels of disaggregation into one to be in compliance with the business rules.
3. **Restated** – For NB only, January 2001 results were restated in March 2001 to correct one transaction that was omitted in error from the results.

AIT

1. This PM was impacted by AIT PM 5c-4 above.

SNET

1. **Late Posting** – ILEC results for January 2001 were posted in April 2001 to address a change in process to print all ILEC and affiliate values even though there is no CLEC activity.
2. **Not Restated** – January through June 2001 results did not properly capture loop qualification requests made by the Company on behalf of CLECs as CLEC transactions. A programming change was made in June 2001 to properly account for these transactions on a prospective basis. Results were not restated.

PM 10a

SWBT

1. This PM was impacted by SWBT PM 5a-1 above.

AIT

1. This PM was impacted by AIT PM 4b-4 above.

PM 10b

PB/NB

1. **Restated** – For PB only, February 2001 results for PMs 10b and 13c were restated in April 2001 in order to remove wireless data that was improperly included in the CLEC aggregate results and to correct one CLEC's results for improperly reported interconnection trunk elements.
2. This PM was also impacted by PB/NB PM 5c-2 above.

AIT

1. **Restated** – March through May 2001 results for the POTS retail equivalent data for 8db loops for PMs 10b, 12c, and 13c was restated in July 2001 due to an error in implementing 1.7 of the business rules. Measures 12c and 13c were subsequently restated to the original calculation as it was discovered the initial data had actually been correct for this specific measure.
2. **Not Restated** – 2001 data for PMs 10b and 12c did not exclude no access or delayed maintenance time for orders processed via LMOS.
3. This PM was also impacted by AIT PMs 4b-5, 4c-7, and 4c-8 above.

PM 11a

SWBT

1. This PM was impacted by SWBT PM 5a-1 above.

AIT

1. This PM was impacted by AIT PM 4a-4 above.

PM 11b

SWBT

1. **Restated** – PMs 11b and 11c March 2001 results for DSL line sharing were restated in May 2001 in Missouri (CLEC and ILEC) and Arkansas (ILEC only) due to a correction of the data file.

AIT

1. This PM was impacted by AIT PMs 4b-2, 4b-3, 4b-4, 4b-5, and 4c-5 above.

PM 11c

SWBT

1. This PM was impacted by SWBT PMs 5c-1 and 11b-1 above.

PB/NB

1. **Restated** – For PB only, January 2001 results were restated in March 2001 to correct an overreporting of repeat troubles due to a manual error and to populate UNE-P data elements that were previously omitted in error.
2. **Restated** – For PB only, May 2001 results were restated in July 2001 in order to correct improperly classified trouble tickets caused by a programming issue associated with the mechanization of the process for calculating this PM.

3. **Restated** – For PB only, October 2001 results were restated in December 2001 related to an error with the counting of trouble reports associated with the broadband line sharing disaggregation.
4. **Not Restated** – A valid exclusion was not taken for both wholesale and retail data for the months of May through December 2001. As parity was not impacted, the Company did not restate results.
5. **Restated** – September through December 2001 data was restated in May 2002 to correct a logic issue that caused repeat trouble reports to be overstated for unbundled loop and line sharing data elements. In addition, the September 2001 data elements were restated in May 2002 to correct a small change in the analog data against which they are compared.
6. This PM was also impacted by PB/NB PM 5c-2 above.

AIT

1. This PM was impacted by AIT PMs 4a-4, 4b-3, 4b-5, 4c-5, 4c-6, 4c-7, 4c-8, and 5c-3 above.

SNET

1. **Restated** – January and February 2001 data was restated in April 2001 because data was not reported originally due to an incorrect identification of a data point in DSS. This also impacted PM 13c.
2. This PM was also impacted by SNET PM 5c-1 above.

PM 12a

SWBT

1. This PM was impacted by SWBT PM 5a-1 above.

AIT

1. This PM was impacted by AIT PM 4a-4 above.

PM 12b

SWBT

1. **Partially Restated** – January through April 2001 results for the dispatch/no dispatch submeasures were improperly stated due to the assignment of trouble tickets based on fieldwork/no fieldwork on the order rather than dispatch/no dispatch on the trouble ticket. Kansas and Oklahoma results were not restated for January and February 2001. This also affected PM 12c.

AIT

1. This PM was impacted by AIT PMs 1-4, 4b-2, 4b-3, 4b-4, 4b-5, and 4c-5 above.

PM 12c

SWBT

1. **Restated** – October 2001 results for one submeasure (mean time to restore UNE – DSL) were restated in December 2001 to correct a data loading error.
2. This PM was also impacted by SWBT PMs 5c-1 and 12b-1 above.

PB/NB

1. **Restated** – For PB only, January 2001 was restated in April 2001 to correct the LNP data element for two CLECs that had been populated with incomplete data due to a clerical error.
2. **Restated** – December 2001 results for the UNE level of disaggregation were restated in April 2002 to correct a data transposition error for one CLEC.
3. This PM was also impacted by PB/NB PM 5c-2 above.

AIT

1. **Restated** – August through December 2001 results were restated in March 2002 to include dispatch and no dispatch disaggregations.
2. **Restated** – August 2001 results for PMs 12c and 13c were restated in October and November 2001 to properly reflect version 1.7 business rules (i.e., DSL disaggregations).
3. This PM was also impacted by AIT PMs 1-4, 4a-4, 4b-3, 4b-5, 4c-5, 4c-7, 4c-8, 5c-3, 10b-1, and 10b-2 above.

SNET

1. This PM was impacted by SNET PM 5c-1 above.

PM 13a

SWBT

1. This PM was impacted by SWBT PM 5a-1 above.

AIT

1. **Restated** – September 2001 results were restated in November 2001 to correct the UNE-P Residential and Business disaggregations.
2. **Restated** – August 2001 results were restated in October 2001 because the wrong line count was used.
3. **Late Posting** – January through April of 2001 was posted in July 2001 to report the UNE Combo level of disaggregation.
4. This PM was also impacted by AIT PM 4a-4 above.

PM 13b

AIT

1. This PM was impacted by PMs 1-4, 4b-2, 4b-3, 4b-4, 4b-5, and 4c-5 above.

SNET

1. **Restated** – January through May 2001 results for several levels of disaggregation were restated in February 2002 due to various calculation issues associated with the denominator.

PM 13c

SWBT

1. This PM was impacted by SWBT PM 5c-1 above.

PB/NB

1. **Not Restated** – For NB only, September 2001 results for one level of disaggregation (UNE-P ISDN PRI Port with Loop) were incorrectly reported as zero when there were actual results. NB elected not to restate as there

were no corresponding wholesale transactions for September 2001 and this is a parity measure.

2. **Restated** – For NB only, June 2001 results were restated in October 2001 to correct the line count for one data element for one CLEC.
3. **Restated** – For PB only, July through December 2001 results were restated in June 2002 for one datapoint in order to disaggregate by dispatch and non-dispatch categories.
4. **Late Posting** – For NB only, August 2001 results which were posted in December 2001 for two submeasurements that were not reported in the original file sent to the FCC.
5. This PM was impacted by PB/NB PMs 5c-2 and 10b-1 above.

AIT

1. This PM was impacted by AIT PMs 4a-4, 4b-3, 4b-5, 4c-5, 4c-7, 4c-8, 5c-3, 10b-1, and 12c-2.

SNET

1. **Restated** – August through October 2001 data was restated in December 2001 to correct the access line count associated with DSL circuits due to an inadvertent elimination of CLEC identifiers in the source system.
2. **Restated** – January through June 2001 results for one submeasurement were restated in June 2002 to include additional access line counts for certain CLECs.
3. **Restated** – August 2001 data for one submeasurement was incorrectly reported in the file sent to the FCC but was properly reflected on the CLEC website. Results were restated in December 2001.
4. This PM was also impacted by SNET PMs 5c-1 and 11c-1 above.

PM 15

AIT

1. **Restated** – April 2001 results were restated in December 2001 for Illinois and Indiana results to include data for one CLEC in each state that was omitted.
2. **Restated** – October 2001 results were restated in March 2002 to include CLEC data received after the initial reporting deadline and to correct certain retail data.

SNET

1. **Restated** – For the period March through December 2001, SNET improperly excluded certain calls from the denominator of the calculation. This error was restated in May 2002.
2. **Not Restated** – June 2001 results for one submeasurement were lacking approximately 20 percent of the data normally collected. This data was not retrievable and was not restated.

PM 16

SWBT

1. **Restated** – February 2001 results for PM 16 were restated in April 2001 to correct data errors.

PB/NB

1. **Late Posting** – For NB only, May 2001 results were not posted until July 2001.

SNET

1. **Not Restated** – For April 2001 LNP coordinated hot cuts (CHCs), SNET incorrectly excluded three CHCs from the measure.
2. This PM was also impacted by SNET PM 1-4 above.

PM 17

PB/NB

1. **Not Restated** – For May 2001 data, the CLEC data was misstated due to the improper exclusion of a CLEC from the CLEC Profile table, which identifies those CLECs that are conducting business in the region.
2. **Not Restated** – Virtual collocation transactions were not broken out into their own level of disaggregation during 2001 as required by the business rules. Results were not restated as there were no missed due dates.

AIT

1. **Restated** – April and May 2001 results were restated in August 2001 to reflect data not previously reported.
2. **Not Restated** – During 2001, no data was reported for the “Additions” level of disaggregation when data actually existed.
3. This PM was also impacted by AIT PM 1-4 above.

PM 18

SWBT

1. **Restated** – April 2001 Missouri data was restated in June 2001 to correct the numerator for one CLEC resulting in the measure.
2. **Not Restated** – Results for January 2001 improperly excluded billings for facilities or UNEs.

AIT

1. **Restated** – July 2001 results were restated in October 2001 to correct errors found in the original results posted.
2. **Not Restated** – January through March 2001 data improperly excluded certain electronically transmitted billing data from the numerator of the calculation.
3. **Not Restated** – For the period under review, the stop time reported has been the time the bill was available as opposed to the transmission time, as stated in the business rules.

PM 19

AIT

1. **Restated** – September 2001 data was restated in December 2001 due to a problem with one of the interfaces.
2. **Restated** – April through June 2001 results were restated in August 2001 to include new interfaces implemented with the March 2001 release of new business rules. Additionally, May through November 2001 data was restated in March 2002 to add another interface.

3. **Restated** – December 2001 results were restated in April 2002 to correct misclassified downtime.

Other Matters

1. **SWBT, PB, NB, AIT, and SNET:** The Company did not report z-scores when the numerator or denominator had less than 10 transactions. Although the FCC indicated it did not agree with the Company's methodology, the FCC issued a directive not to restate results for 2001 data and consequently not to adjust penalty calculations related to this issue.
2. **SWBT PM 3:** At the direction of the Texas Public Utility Commission (TPUC), SWBT began reporting UNE-P orders as orders that would flow through its EASE system. SWBT does not believe its reporting prior to this date was in error.
3. **SWBT PM 15:** During 2001, SWBT did not post PM 15 results within 20 days of month-end. This was as a result of a change in Version 1.7 of the business rules from the use of a study week to 20 business days. As a result, data was not available in time to file by the 20th of the following month.
4. **AIT:** The February 20, 2001 submission to the FCC contained preliminary data for January 2001. The final data was sent on February 21, 2001.

FCC Business Rules

SWBT – AIT – SNET

- PM 1** – Percent Firm Order Confirmations (FOC) Returned on Time for LSR Requests
- PM 1.1** – Percent Firm Order Confirmations (FOCs) for XDSL-Capable Loops & Line Sharing Returned Within “x” Hours
- PM 2** – Average Response Time For OSS Pre-Order Interfaces
- PM 3** – Order Process Percent Flow Through
- PM 4a** – Percent SWBT Caused Missed Due Dates – POTS
- PM 4b** – Percent SWBT Caused Missed Due Dates – Design
- PM 4c** – Percent SWBT Caused Missed Due Dates – UNE
- PM 4d** – Percent Mechanized Completion Notifications Returned Within One Day of Work Completion
- PM 5a** – Percent POTS/UNE-P Trouble Report Within 10 Days (I-10) of Installation
- PM 5b** – Percent Installation Reports (Trouble Reports) Within 30 Days (I-30) of Installation – Design
- PM 5c** – Percent Installation Reports (Trouble Reports) Within 30 Days (I-30) of Installation – UNE
- PM 6a** – Mean Installation Interval – POTS
- PM 6b** – Average Installation Interval – Design
- PM 6c** – Percent (UNEs) Installations Completed Within the Customer Requested Due Date
- PM 6c.1** – Percent Installations Completed Within the Customer Requested Due Date for LNP With Loop
- PM 7a** – Average Delay Days for SWBT Caused Missed Due Dates – POTS
- PM 7b** – Average Delay Days for SWBT Caused Missed Due Dates – Design
- PM 7c** – Average Delay Days for SWBT Caused Missed Due Dates – UNE
- PM 8** – Average Installation Interval – DSL
- PM 9** – Percent Missed Repair Commitments – POTS
- PM 10b** – Percent Missed Repair Commitments – UNE
- PM 11a** – Percent Repeat Reports – POTS
- PM 11b** – Percent Repeat Reports – Design
- PM 11c** – Percent Repeat Reports – UNE
- PM 12a** – Mean Time to Restore – POTS
- PM 12b** – Mean Time To Restore – Design
- PM 12c** – Mean Time To Restore – UNE
- PM 13a** – Trouble Report Rate – POTS
- PM 13b** – Trouble Report Rate
- PM 13c** – Trouble Report Rate – UNE
- PM 14** – Average Trunk Restoration Interval for Service Affecting Trunk Groups (measured tickets only)
- PM 15** – Percent Trunk Blockage
- PM 16** – CHC/FDT LNP with Loop Provisioning Interval
- PM 17** – Percent Missed Collocation Due Dates
- PM 18** – Mechanized Electronic Billing Timeliness EDI and BDT (Wholesale Bill)
- PM 19** – OSS Interface Availability
- PM 20** – Common Transport Trunk Blockage

FCC Business Rules

PB – NB

- PM 1** – Average FOC Notice Interval
- PM 2** – Average Response Time (to Pre-Order Queries)
- PM 3** – Percentage of Flow-Through Orders
- PM 4a** – Percent of Due Dates Missed – POTS
- PM 4b** – Percent of Due Dates Missed – Design
- PM 4c** – Percent of Due Dates Missed – UNE
- PM 4d** – Completion Notice Interval
- PM 5a** – Percentage Troubles in 10 Days for Non-Special Orders – (Resale POTS)
- PM 5b** – Percentage Troubles in 30 Days for Special Services Orders - (Resale Design)
- PM 5c** – Percentage Troubles in 10 Days for Non-Special Services UNE Orders and 30 Days for Special Services UNE Orders
- PM 6a** – Average Completed Interval – POTS
- PM 6b** – Average Completed Interval – Design
- PM 6c** – Percent Completed Within Standard Interval – UNE
- PM 7a** – Delay Order Interval to Completion Date (for Lack of Facilities) – POTS
- PM 7b** – Delay Order Interval to Completion Date (for Lack of Facilities) – Design
- PM 7c** – Delay Order Interval to Completion Date (for Lack of Facilities) – UNE
- PM 8** – Average Completed Interval – (DSL)
- PM 9** – Average Response Time for Loop Make-Up Information
- PM 10a** – Percentage of Customer Trouble Not Resolved within Estimated Time – POTS
- PM 10b** – Percentage of Customer Trouble Not Resolved within Estimated Time – UNE
- PM 11a** – Frequency of Repeat Troubles in 30 Day Period – POTS
- PM 11b** – Frequency of Repeat Troubles in 30 Day Period – Design
- PM 11c** – Frequency of Repeat Troubles in 30 Day Period – UNE
- PM 12a** – Average Time to Restore - POTS
- PM 12b** – Average Time to Restore – Design
- PM 12c** – Average Time to Restore – UNE
- PM 13a** – Customer Trouble Report Rate – POTS
- PM 13b** – Customer Trouble Report Rate – Design
- PM 13c** – Customer Trouble Report Rate – UNE
- PM 14** – Average Trunk Restoration Interval for Service Affecting Trunk Groups
- PM 15** – Percent Trunk Blockage
- PM 16** – Coordinated Customer Conversion as a Percentage on Time
- PM 17** – Percent Missed Collocation Due Dates
- PM 18** – Wholesale Bill Timeliness
- PM 19** – Percentage of Time Interface Is Available
- PM 20** – Percent Blocking on Common Trunks